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BY ECF

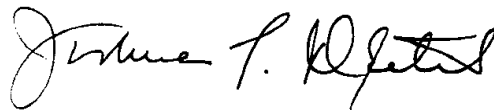
The Honorable Cathy Seibel
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Matthew Madonna,*
S3 17 Cr. 89 (CS)

Dear Judge Seibel:

This letter is submitted in connection with defendant Matthew Madonna's (and his co-defendants') motion for a new trial pursuant to Rule 33, Fed.R.Crim.P. Attached hereto is the March 24, 2022, issue of *Gang Land News*, to which defense counsel referred during yesterday's court proceedings. Also, with respect to the trial testimony of government witness David Evangelista, his testimony was perjurious in the following places in the transcript: T. 3049 lines 10-19 (October 24, 2019); T. 3059 lines 22-24 (October 24, 2019); T. 3210 lines 6-9 (October 25, 2019); T. 3232 lines 17-19 (October 25, 2019). *See also* T. 3001 lines 4-8 & 12-14 (October 24, 2019); T. 3002 lines 16-18 (October 24, 2019); T. 3113 lines 12-25 (October 25, 2019); T. 3114 lines 1-19 (October 25, 2019); T. 3117 lines 21-25 through T. 3118 line 1 (October 25, 2019); T. 3122 lines 6-19 (October 25, 2019); Government Exhibit 3502-33 (Mr. Evangelista's Cooperation Agreement, at page 2 subparagraphs (a), (f), and page 4, last paragraph).

Respectfully submitted,



Joshua L. Dratel

JLD/
Encl.